

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JO BENNETT,

Plaintiff,

v.

SCHNADER HARRISON SEGAL & LEWIS  
LLP, et al.,

Defendants.

Case No. 2:24-cv-00592-JMY

**STIPULATION OF EXTENSION OF TIME**

WHEREAS, the parties in the above action have been engaging in good faith discussions regarding the possibility of an early production of documents that would permit Plaintiff to consider amending her Complaint and potentially eliminate certain Defendants (or eliminate certain Defendants from some counts) and add other Defendants;

WHEREAS, the parties believe a two-week extension of Defendants' responsive pleading deadline would help to facilitate this process by allowing Plaintiff time to review the produced material and decide whether to amend before Defendants' current responsive pleading deadline;

WHEREAS, should Plaintiff decide to amend her Complaint based on the information received from Defendants, the parties will provide the Court with new proposed deadlines for Plaintiff's amended pleading and Defendants' responsive pleading.

THEREFORE, pursuant to United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 7.4, the parties stipulate and agree that all Defendants shall have until May 14, 2024, to plead or file a response to Plaintiff's Complaint.

Dated: April 24, 2024

Respectfully submitted:

/s/ R. Joseph Barton

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*Attorneys for Defendants*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_ 2024

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Hon. John Milton Younge  
United States District Judge

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date, a true and correct copy of the foregoing Stipulation of Extension of Time was filed electronically, is available for viewing and downloading from the ECF system, and was served upon the following under the ECF Guidelines of this Court:

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Date: April 24, 2024

/s/ Andrew D. Salek-Raham  
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